

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Lifeline and Link Up)	WC Docket No. 11-42
Reform and Modernization)	
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Federal-State Joint Board on)	
Universal Service)	CC Docket No. 96-45

**REPLY COMMENTS OF
THE TELECOMMUNICATIONS REGULATORY BOARD OF PUERTO RICO
IN RESPONSE TO THE EMERGENCY PETITION FOR DECLARATORY RULING
AND INTERIM RELIEF FILED BY TRACFONE WIRELESS, INC.**

The Telecommunications Regulatory Board of Puerto Rico (“Board”), through undersigned counsel, respectfully submits these reply comments in accord with the pleading cycle established by the Public Notice released by the Federal Communications Commission (“Commission”) on February 27, 2012,¹ and in response to the comments filed by TracFone Wireless, Inc. (“TracFone”),² T-Mobile USA, Inc. (“T-Mobile”),³ the National Association of State Utility Consumer Advocates (“NASUCA”),⁴ and Sprint Nextel Corporation (“Sprint”).⁵

¹ *Comment Sought on TracFone Wireless, Inc. Emergency Petition for Declaratory Ruling and Interim Relief*, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45, Public Notice, DA 12-295 (rel. Feb. 27, 2012).

² Comments of TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (dated March 9, 2012).

³ Comments of T-Mobile USA, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (dated March 9, 2012).

⁴ Comments of The National Association of State Utility Consumer Advocates, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (dated March 9, 2012).

⁵ Comments of Sprint Nextel Corporation, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (dated March 9, 2012).

As the Board explained in its comments,⁶ more than a year ago, it carefully examined and began auditing the Lifeline program in Puerto Rico because of the many instances where the subscribed participants were receiving the service from more than one carrier. As part of its ongoing process, the Board has been taking steps to reduce from its Lifeline rolls those residents who are improperly receiving multiple benefits per person or family unit while, at the same time, ensuring that the Lifeline recipients are not deprived of service.

The Board's opening comments showed that the alleged concerns in TracFone's petition⁷ were meritless because the Board has, throughout the process, taken actions to protect consumers. The Board showed that, while its enabling legislation required "permanent ineligibility"⁸ for those consumers found to be receiving an improper benefit, the Board initially reduced this period to one year, then to four months, and then, after finding that most of the affected residents were receiving multiple benefits because of the improper conduct by ETCs, eliminated the period altogether.⁹

The Board's opening comments also showed that a recipient could petition the Board and show why he/she should continue receiving multiple benefits, and that the Board had established

⁶ Comments of the Telecommunications Regulatory Board of Puerto Rico In Response to the Emergency Petition for Declaratory Ruling and Interim Relief Filed by TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (filed March 9, 2012).

⁷ *Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service*, Emergency Petition for Declaratory Ruling and Interim Relief, WC Docket No. 11-42 *et al* (Feb. 22, 2012), at 4.

⁸ 27 L.P.R.A. § 269e(11)(3).

⁹ The Board's March 9, 2012 comments attached, at Exhibit C, a copy of its March 7, 2012 Resolution and Order on this topic. The undersigned subsequently learned that document contained two translation errors. A correct translation is attached, along with a certificate of translation. The Board respectfully requests that the Commission substitute this document for the previously submitted document, and regrets any confusion caused by this error.

an expedited appeal process to review and decide these claims. The Board explained that hundreds of residents had already invoked this process.

The Board also showed that the Commission's Lifeline Order supported those jurisdictions that had moved forward with their own Lifeline audit mechanisms,¹⁰ and that nothing in the Commission's Order required Puerto Rico to use the IDRP process urged by TracFone. The Board thus showed that TracFone's petition should be denied in its entirety.

In addition to the Board, four other parties submitted comments to the Commission in response to the TracFone petition.

T-Mobile explained that it "supports federal and state efforts to control the size of the Lifeline fund by de-enrolling ineligible customers while protecting eligible customers' access to emergency services and other benefits of Lifeline"¹¹ and that "[t]he public need for Lifeline funding is far too great to provide subsidies to consumers who receive funding from multiple ETCs or are not eligible to participate in the program."¹² As shown in the Board's opening comments, the Board's ongoing process is entirely consistent with these twin objectives of removing ineligible consumers while protecting eligible consumers.¹³

To that end, T-Mobile explained that it "has been working with the [Board] to try to find a solution that successfully eliminates duplicates without denying eligible subscribers benefits to which they are entitled."¹⁴ It explained that it "appreciates the efforts of the [Board] to prevent

¹⁰ *Id.* at ¶ 221.

¹¹ Comments of T-Mobile USA, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45, at 1.

¹² *Id.* at 2.

¹³ Comments of the Telecommunications Regulatory Board of Puerto Rico In Response to the Emergency Petition for Declaratory Ruling and Interim Relief Filed by TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (filed March 9, 2012).

¹⁴ *Id.* at 3.

fraud in the program and will continue to work with the [Board] to resolve these issues and ensure that Lifeline benefits are properly paid.”¹⁵ It also recognized the Board’s efforts to develop a centralized database and its ongoing appeal process.¹⁶

Sprint also credited the Board for recognizing that “steps must be taken to reduce the number of duplicate Lifeline subscribers in Puerto Rico.”¹⁷ Sprint urged the Board to adopt a “template to be used by all Lifeline service providers in Puerto Rico” so that “Lifeline carriers provide the information needed by the TRB, in the format it requires.”¹⁸ The Board has already done so, releasing numerous orders¹⁹ that contain the exact fields of information, the allowed characters in each and the file format that each ETC must use for reporting, in addition to the template found in § 14.10 of Regulation 8093.

NASUCA, while acknowledging that the “Board’s position has yet not been presented directly to the FCC and public,”²⁰ was also generally supportive of the Board’s efforts, but commented on the need to ensure that there were adequate protections against a consumer losing its benefits.²¹ NASUCA cited several provisions in the Commission’s Lifeline Order that it believed were important and necessary, including:

¹⁵ *Id.* at 4.

¹⁶ *Id.* at 3.

¹⁷ Comments of Sprint Nextel Corporation, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (dated March 9, 2012) at 2.

¹⁸ *Id.* at 3.

¹⁹ *See, e.g.*, Board Orders issued on December 14, 2001; June 24, 2004; August 25, 2005; December 14, 2004; February 3, 2005; April 6, 2005; November 17, 2005; October 4, 2006; and September 22, 2010.

²⁰ Comments of the National Association of State Utility Consumer Advocates, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (dated March 9, 2012), at 3.

²¹ *Id.*

- a database to detect and prevent improper duplicate payments;²²
- a dispute resolution process whereby exceptions are considered and granted (covering, for example, duplicate benefits as a result of a mistake or without the requisite intent);²³ and
- the need to reserve debarment only for “false, sworn statements” made as part of the eligibility certification process.²⁴

The Board agrees with these comments by NASUCA. Indeed, as shown in the Board’s comments, the Board’s ongoing process contains each of these protections.

First, like the database contemplated by the Commission’s Lifeline Order, and endorsed by NASUCA, the Board is developing a database that will be used to identify duplicate recipients in Puerto Rico.²⁵

Second, like the dispute resolution process for managing duplicate claims that was directed by the Commission and endorsed by NASUCA, the Board has a process, which has been invoked by hundreds of residents to date, whereby a consumer who receives notice that he/she is in danger of losing a benefit to which he/she is not entitled can request reconsideration at the Board, through an expedited process, and explain why he/she should continue receiving (otherwise ineligible) multiple benefits. This ensures that consumers are not improperly denied access to Lifeline benefits, which is the primary concern voiced by NASUCA, and allows the Board to determine if the apparently improper benefits are, in reality, proper (*i.e.*, multiple households that share a single address); whether they were being received through mistake, fraud or some other reason; or whether there exists some other reason why multiple benefits are

²² *Id.* at 5 (citing Lifeline Order at ¶¶ 179, 210).

²³ *Id.* at 5, 6 (citing Lifeline Order at ¶ 115).

²⁴ *Id.* at 7 (citing Lifeline Order at ¶¶ 115, 275, n.314).

²⁵

warranted. The Board's process thus is completely congruent with the protections that NASUCA supports in its comments.

Finally, NASUCA appropriately recognizes that debarment can be appropriate if the recipient was obtaining improper benefits through “false, sworn statements” made as part of the eligibility certification process.²⁶ Indeed, that has always been the rule in Puerto Rico. The Board's enabling legislation requires recipients to state, in the application for Lifeline benefits, “*under penalty of prejudice and permanent ineligibility*, that neither he/she, nor any residing member of the family unit have been receiving the benefit of the subsidy provided by said program and for which they are filing [the] application.”²⁷ Thus, if a resident is found to have been receiving improper benefits, this is in violation of a “false, sworn statement” and, under the Board's enabling legislation, warrants permanent debarment.²⁸

As the Board showed in its opening comments, it initially decided to reduce this period to one year; then, after consultation with the ETCs, reduced it further to four months; finally, it decided to eliminate it altogether.²⁹ NASUCA's concern, therefore, that residents will be without benefits is not an issue.

In contrast with the balanced, insightful and nuanced comments submitted by T-Mobile, Sprint and NASUCA, TracFone's comments continue its regrettable pattern of misinformation, obfuscation and deception. Notably, TracFone essentially ignores its prior filing, except to repeat its since-discredited argument that the Board's process will leave residents without any

²⁶ Comments of The National Association of State Utility Consumer Advocates, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (dated March 9, 2012), at 7 (citation omitted).

²⁷ 27 L.P.R.A. § 269e(11)(3) (emphasis added).

²⁸ *Id.*

²⁹ Comments of TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (dated March 9, 2012).

Lifeline benefits.³⁰ Instead, the majority of TracFone's filing contains allegations of Board actions in the past month. While these specific TracFone misrepresentations of fact should not have any effect on the Commission's general review of the Board's policies and practices, the Board believes that it is important to set the record straight on these specific factual misrepresentations.

While there are many misstatements in TracFone's comments, it first represents that the Board cancelled a meeting with TracFone on February 27, 2012 because TracFone filed its petition with the Commission.³¹ This is false. The meeting was cancelled because TracFone was not in compliance with its Board filings. On February 14, 2012 – 13 days *before* the February 27 meeting was cancelled and *eight days before TracFone filed its petition with the Commission* – the Board advised TracFone that its submission to the Board was incomplete, incorrect and did not comply with the required format.³² TracFone's continued refusal to comply with the clear and express terms of the Board's regulation is what led to a cancellation of the February 27 meeting. TracFone's refusal to acknowledge that its filing was – and is – incomplete, and its decision to accuse the Board of improper conduct, speaks for itself.

³⁰ TracFone's filing acknowledges that the Board had reduced the period to four months. *See id.* at n.2 ("during a meeting at the Board on February 17, the Board stated orally that the one year debarment period would be reduced to four months. . . . Today (March 9), the Board issued a Resolution and Order memorializing its actions taken on February 17"). Since the Board issued and disseminated another resolution on the same day in which it eliminated the period altogether, TracFone knows it is wrong to keep arguing that the Board is depriving residents of benefits.

³¹ Comments of TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (dated March 9, 2012) at 6-7 ("The stated reason for this eleventh hour meeting cancellation was that TracFone was deemed not to be in compliance with what the Board directed on February 17, specifically, TracFone's election to file its Emergency Petition with the Commission").

³² *See* Comments of TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (dated March 9, 2012) at Attachment 3 (February 14, 2012 letter).

In fact, even the self-serving letter written by TracFone's counsel to the Board after the cancellation of the meeting states only that "the reason for the cancellation of the meeting was TracFone Wireless' supposed lack of compliance with the terms established by the Telecommunications Regulatory Board on the meeting held Friday, February 17, 2012."³³ Nothing in that letter suggests that the meeting was cancelled because TracFone filed its petition with the Commission.

Also, TracFone's claim that February 2012 was the "first time" it learned that it needed to submit full names and full social security numbers³⁴ is completely false. Multiple Board Orders, tracing back to 2001, have included these requirements.³⁵ The Board's 2011 regulations also required each ETC to submit a full social security number and a complete name, including both last names.³⁶ And, on August 29, 2011, and again on September 22, 2011, TracFone's representatives met with Board personnel and discussed these specific regulations, the requirements contained therein, and TracFone's capabilities for meeting these requirements. TracFone's suggestion that it is now surprised that these data points are required by the Board does not square with the facts.

The remainder of TracFone's submission does not warrant an extended response. While TracFone complains that the Board's requirement of a full social security number and a full

³³ *Id.* at Attachment 2.

³⁴ Comments of TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (dated March 9, 2012) at 8.

³⁵ These requirements have been contained in Board Orders issued on December 14, 2001; June 24, 2004; August 25, 2004; December 14, 2004; February 3, 2005; April 6, 2005; November 17, 2005; October 4, 2006; and September 22, 2010.

³⁶ Comments of the Telecommunications Regulatory Board of Puerto Rico In Response to the Emergency Petition for Declaratory Ruling and Interim Relief Filed by TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (filed March 9, 2012), at Exhibit A.

name is “inappropriate” because, in TracFone’s opinion, this will not aid the Board in detecting fraud and duplicate enrollment,³⁷ TracFone does not sit as a Court of Appeals on the Board’s policy judgments. Similarly, TracFone’s assertion that it is “discriminatory” for the Board to require submission of full names³⁸ is offensive. All official documents in Puerto Rico must include both last names. The fact that this requirement is not the practice elsewhere is irrelevant. TracFone has chosen to do business in Puerto Rico; it must comply with its rules.

CONCLUSION

The Board takes very seriously its twin obligations to ensure that its eligible residents are receiving appropriate benefits and that ineligible recipients are removed from the program. Throughout its ongoing process, it has carefully balanced these objectives in a manner that protects the beneficiaries of the Lifeline program and fulfills the Board’s fiduciary responsibility to protect the public fisc.

Respectfully submitted,

/s/Robert F. Reklaitis

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March 19, 2012

***Counsel for The Telecommunications
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³⁷ Comments of TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (dated March 9, 2012) at 8.

³⁸ *Id.*

Exhibit C

**ASSOCIATED FREE STATE OF PUERTO RICO
TELECOMMUNICATION REGULATORY BOARD
OF PUERTO RICO**

**IN RE:
UNIVERSAL SERVICE FUND
LIFELINE/LINKUP**

CASE No.: JRT-2001-SU-0003

RESOLUTION AND ORDER

By means of this *Resolution and Order*, we receive the rule applicable to the individuals identified as duplicated for reasons of their social security of Regulation Number 8093, *Provisional Amendments to the Regulations on Universal Service*, in abeyance), as a result of the preliminary findings encountered by this Board.

Background:

As known by all eligible telecommunication companies (CTEs), this Board has issued various orders, related to the *Lifeline* program in Puerto Rico, in order for us to be able to comply with our ministerial function of overseeing the *Universal Service Fund*, by creating measures against loss, fraud and abuse of the , resources originating from it¹ The foregoing, after noticing a dizzying ascent starting in 2010 in the number of subscribers of said *Fund*, and after a detailed analysis of the reports submitted by the CTEs, that revealed a general pattern of lack of information and/or compliance with the criteria determined by the Board, over time. This resulted in an alarming number of duplicated and triplicated beneficiaries.²²

We issued *Resolutions and Orders*, on January 27, 2011, on July 13, 2011³ and January 24, 2012. To understand that the implementation of these norms and regulations was of an urgent nature, and sought the protection of public funds, the Board notified the emergency situation explained in detail above to the Governor of Puerto Rico, Honorable Luis G. Fortuno Burset, who certified the above on October 20, 2011, so that the *Provisional Amendments to Regulations on Universal Service* (Regulation 8093) had **immediate application**, under Sec. 2.13 of LPAU, 3 L.P.R.A. § 2133.

As a result of the foregoing, in particular our latest Order of January 24, 2012, CTE's: Puerto Rico Telephone Company, Inc. on its own behalf and DBA Claro, Tracfone on its own behalf and DBA Safelink, AT&T Mobility, Sprint, T-Mobile, Open Mobile asked for a meeting with the Board, which took place, on February 17, 2012, at our facilities. The Chairman of this Board, Sandra E. Torres and the Associate Member Gloria Escudero Morale were presents. After several hours of conversation, the parties arrived at various agreements, these among the most important:

¹ Through Law No. 213 of September 12, 1996, as amended, 27 L.P.R.A. § 265 *et seq.* (Law 213) the Puerto Rico Telecommunication Regulatory Board was created (Board) and it was expressly given the assignment, in regard to the universal service, of: 1) recognizing the telecommunication service as one whose performance pursues a purpose of high public interest, within a competitive market; 2) ensuring that a universal service it provided at a just, reasonable and affordable by all citizens, 3) dividing equitably among all telecommunication companies obligations, responsibilities and charges attributed to the development and preservation of universal service; 4) establishing specific support mechanisms , predictable and sufficient for preserving and developing universal service; 5) giving access to telecommunication services, reasonably comparable to those provided in urban areas to the consumers throughout the Island, including those with low income and who reside in rural areas or in areas in which access to such services is costly, verifying that said services are available in all of Puerto Rico, at just and reasonable process. 27 L.P.R.A. § 265.

² Upon a detailed observation of the information, we noticed that in some instances two or three services have been registered under the same address or the same number of social security. This irregularity in the performance and obtaining of the subsidy, was designated as duplicates and/or triplicates and, as a last resort, which shows that ineligible persons are benefiting , because of fraud and possible negligence on the part of the telecommunication companies, that provided eligibility to persons against the Law and applicable regulations.

³ Several CTEs appeared before the Court of Appeals to challenge the validity of both resolutions in cases KLRA 2011-0776; KLRA 2011-0780; KLRA 2011-0900; KLRA 2011- 0905; and KLRA 2011-0906. On December 16, 2011, the Honorable Court of Appeals issued a ruling in which it dismissed all appeals for administrative review, deeming them academic, in view of the Governor's emergency certification, and decreed that the Provisional Amendments to the Regulation on Universal Service (Regulation 8093) were applicable immediately under Sec. 2.13 of LPAU, 3 L.P.R.A. § 2133.

- all CTEs will send all cards to the duplicated beneficiaries for social security or family unit, as ordered by the Board since January of 2011 and
- the Board will change the rules provided in Regulation 8093 for duplication of social security, so that a person may not receive benefits from the *Lifeline* program for a period of four months.⁴

Discussion:

This Board has received thousands of calls and personal visits from consumers, since mailing the cards⁵ to the duplicated beneficiaries for social security or family unit, announcing the termination of their *Lifeline* benefits.

The forms they will fill out as part of the summary claims proceeding, began to illustrate patterns of conduct of the CTEs, that are certainly alarming, fraudulent and possibly criminal, which, as we mentioned in our *Resolution and Order* of January 27 of 2011, will be referred to the appropriate state and federal authorities. Moreover, they will be the subject of separate *Orders to Show Cause*, which will be served in due time, as the CTEs are exposed to the provisions of Section 13 c) of Regulation Number 7795, such as, but not limited to: (i) revocation of certification for rendering telecommunication services in Puerto Rico; (ii) revocation of the designation of eligibility; and (iii) imposition of daily fines and penalties of up to twenty-five thousand dollars per violation, in accordance with the provisions of Article II-7 of Law No. 213 of September 12, 1996, as amended, 27 L.P.R.A. § 267f (b) (1).

Likewise, we begin to detect that the majority of consumers have allegedly been misled and even deceived, even when they divulged that they had already the subsidy; except for those who have carried the service or are not customers of a CTE, that continues to report them to this Board.

Finally, as we deem it appropriate not to penalize consumers and, therefore, we resolved to leave pending our rule applicable to duplicates for social security of January 2012, in such a way that the customer can remain with the service to which the subsidy was first applied, if so desired. Therefore, in order for all consumers to be under the same conditions, this Board will allow the beneficiaries who already lost their subsidy in March of 2012 (customer base of December of 2011), may request it again. The Board will be the only entity authorized to announce said resolution to the consumers, by the means it deems appropriate.

Finally, this Board resolves that from now on, any CTE that has intracompany duplications will be exposed to an automatic fine of ten thousand (\$10,000) dollars per duplication, since the CTEs must obtain a control code designation, to be assigned on the basis of existing customer data.

In view of the foregoing, this Board RESOLVES and ORDERS:

IT IS RESOLVED TO LEAVE PENDING OUR RULE APPLICABLE TO DUPLICATES FOR SOCIAL SECURITY OF JANUARY OF 2012, IN SUCH A WAY THAT THE CUSTOMER CAN REMAIN WITH THE SERVICE TO WHICH THE SUBSIDY WAS FIRST APPLIED, IF SO DESIRED.

LIKewise, IT IS DETERMINED THAT THE BENEFICIARIES WHO ALREADY LOST THEIR SUBSIDY IN MARCH OF 2012 CAN

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TELECOMMUNICATION REGULATORY BOARD
OF PUERTO RICO
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⁴ The Regulations provide that the person may not receive the benefit for one year.

⁵ The language of both cards was written by this Board y and sent to the CTEs, in order for the same language to be used uniformly by all companies, so that this Board will ensure that customers receive information correctly and at the same conditions.

MAY REQUEST IT AGAIN, BUT THE BOARD WILL BE THE ONLY ENTITY AUTHORIZED TO ANNOUNCE SAID RESOLUTION TO THE CONSUMERS, BY THE MEANS IT DEEMS APPROPRIATE.

IT IS ESTABLISHED THAT FROM NOW ON, ANY CTE THAT HAS INTRACOMPANY DUPLICATES WILL BE EXPOSED TO AN AUTOMATIC FINE OF TEN THOUSAND (\$10,000) DOLLARS PER DUPLICATION.

IT IS ORDERED THAT THE CTES MUST OBTAIN A CONTROL CODE DESIGNATION, TO BE ASSIGNED ON THE BASIS OF EXISTING CUSTOMER DATA.

Stipulating that having exhausted the remedy of reconsideration before the Telecommunication Regulatory Board of Puerto Rico, and in compliance with the provisions of Section 4.2 of the Uniform Administrative Procedure Act (Law No. 170 of August 12, 1988, as amended), a party adversely affected by this Resolution and Order may submit a Request for Review before the Court of Appeals of Puerto Rico having jurisdiction, within a period of thirty (30) days, counted starting from the date the copy of service of the final Resolution and Order for reconsideration issued by the Board is entered on the record. The party will serve the submission of the request for review to the Board and to all parties within the period for requesting said review. Service may be carried out by mail. Stipulating that if the date of entering on the record a copy of service of the final order or resolution for the Board's reconsideration is entered on the record, is different from the date of mailing said service, the period of thirty (30) days for requesting judicial review will be calculated starting on the date of mailing.

SERVE this Resolution and Order to the eligible telecommunication companies: Puerto Rico Telephone Company, Inc, Ledo. Walter Arroyo, PO Box 360998, San Juan, PR 00936-0998; T-Mobile Puerto Rico LLC, Leda. Jeanne Habib, 654 Ave. Muñoz Rivera, Suite 2000, San Juan, PR 00918; SprintCom, Inc. h/n/c Sprint PCS, Ledo. Miguel J. Rodríguez Marxuach; PO Box 16636, San Juan, PR 00908-6636; AT&T Mobility Puerto Rico, Inc, Leda. Rebecca Guerríos, PO Box 192830, San Juan, PR 00919-2830; PR Wireless, Inc. h/n/c Open Mobile, Ledo. Javier Lamoso, PO Box 71569, San Juan, PR 00936-8669; WorldNet Telecommunications, Inc, Leda. Vanessa Santo Domingo Cruz, PO Box 3365, Guaynabo, PR 00970-3365; Sr. David Bogaty, Centro Internacional de Mercadeo, 90 Carretera 165, Suite 201, Guaynabo, PR 00968-8059; Tracfone Wireless, Inc, Ledo. Edwin Quiñones, PO Box 19417, San Juan, PR 00910; Telóte h/n/c Life Wireless, Ledo. Roberto L. Prats Palerm, American Airlines Building, 1509 López Landrón, 10 Floor, San Juan, PR 00911; Absolute Mobile, Inc, Sr. Christopher Peltier, PO Box 830010, Ocala, FL 34483-0010; TerraCom, Inc, Leda. Jessica Hernández Sierra, Goldman Antonetti & Córdova, PSC, PO Box 70364, San Juan, PR 00936-8364

Thus agreed upon by the Board, March 7, 2012.

CERTIFICATION

I HEREBY CERTIFY that this copy is the true and exact copy of the Resolution and Order approved by the Board, on March 7, 2012. I also CERTIFY that today, March 8, 2012, I delivered a copy of this Resolution and Order to the parties indicated in the order for service and proceeded with entering it on the record.

IN WITNESS WHEREOF I sign this document in San Juan, Puerto Rico, today, March 7, 2012

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TELECOMMUNICATION REGULATORY BOARD
OF PUERTO RICO
1996


Ciorah J. MONTES GILORMINI

Board Secretary



March 14, 2012

Certification

Park IP Translations

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Spanish into English of the Resolution and Order approved by the Associated Free State of Puerto Rico Telecommunication Regulatory Board of Puerto Rico, on March 7, 2012.

A handwritten signature in black ink, reading 'Abraham I. Holczer', is positioned above a horizontal line.

Abraham I. Holczer

Project Manager